

**STATEMENT OF BASIS (AI No. 9789)**

for the draft modified Louisiana Pollutant Discharge Elimination System permit No. **LA0091961** to discharge to waters of the State of Louisiana.

**THE APPLICANT IS:** Gulf Island Fabrication, Inc.  
East Yard, West Yard, and Southport  
Post Office Box 310  
Houma, Louisiana 70361

**ISSUING OFFICE:** Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313

**PREPARED BY:** Lisa Kemp

**DATE PREPARED:** October 17, 2008

**1. PERMIT STATUS****A. Reason For Permit Action:**

Modification of an existing Louisiana Pollutant Discharge Elimination System (LPDES) permit to add Outfall 801, treated sanitary wastewater, following regulations promulgated at LAC 33:IX.3105. In accordance with LAC 33:IX.3105.B.2, only those permit limitations and conditions pertaining to the draft modification(s) are open for public comment. This outfall will serve the new corporate office building that is being constructed.

**B. LPDES permit -** LPDES permit effective date: March 1, 2007  
LPDES permit expiration date: February 28, 2012  
EPA has not retained enforcement authority.

**C. Date Application Received:** September 15, 2008. The facility submitted a Notice of Intent to Discharge Sanitary Wastewater for the new Outfall 801. Outfall 801 would then be added to the existing individual permit in the renewal application due in 2011. The estimated flow from Outfall 801 is 600 gallons per day (gpd). However, the facility does not qualify for the Class I Treated Sanitary Wastewater General Permit (LAG530000) because the total sanitary flow from the facility will be 41,600 gallons per day. The Class III Treated Sanitary Wastewater General Permit (LAG540000) is expired and has not been reissued to date. Therefore, a major modification of the existing permit is being issued to add Outfall 801.

**2. FACILITY INFORMATION****A. FACILITY TYPE/ACTIVITY -** fabricator of offshore oil and gas structures

Gulf Island Fabrication (GIF) is comprised of three yards, East Yard (formerly known as the Main Yard), West Yard, and Southport, located on the Houma Navigation Canal. GIF is an existing facility which fabricates offshore structures utilized by the oil and gas industry. The facility discharges treated sanitary wastewater, hydrostatic test wastewater, utility washwater, and industrial stormwater runoff.

Statement of Basis for  
 Gulf Island Fabrication, Inc.  
 East Yard, West Yard, and Southport  
 LA0091961, AI No. 9789  
 Page 2

**B. FEE RATE – per 2006 statement of basis**

1. Fee Rating Facility Type: minor
2. Complexity Type: II\*
3. Wastewater Type: III
4. SIC codes: 3731, 3441, and 1389

\* The Complexity Type was BPJ'd from IV to II to match other similar fabricating facilities.

**C. LOCATION - 583 Thompson Road, in Houma, Terrebonne Parish**  
 Latitude 29° 32' 37", Longitude 90° 41' 45"

**3. PROPOSED MODIFICATIONS**

1. Add Outfall 801 for the discharge of treated sanitary wastewater from the proposed GIF Corporate Headquarters.

**4. OUTFALL INFORMATION**

**Outfall 801**

Discharge Type:	treated sanitary wastewater from the GIF Corporate Headquarters
Treatment:	extended aeration unit with chlorination
Location:	at the point of discharge from the sewage treatment facility located behind the office building, prior to combining with the other waters Latitude 29° 32' 33", Longitude 90° 41' 44"
Flow:	intermittent; estimated flow is 600 gpd
Discharge Route:	by pipe to an internal ditch, thence through Outfall 001 to the Houma Navigation Canal

**5. RECEIVING WATERS**

STREAM – Houma Navigation Canal – From Houma to Bayou Pelton

BASIN AND SEGMENT – Terrebonne Basin, Subsegment 120509

DESIGNATED USES - a. primary contact recreation  
 b. secondary contact recreation  
 c. propagation of fish and wildlife  
 d. drinking water supply

**6. TMDL STATUS**

Subsegment 120509, Houma Navigation Canal – Houma to Bayou Pelton, is not listed on LDEQ's Final 2006 303(d) List as impaired, and to date no TMDLs have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

Statement of Basis for  
 Gulf Island Fabrication, Inc.  
 East Yard, West Yard, and Southport  
 LA0091961, AI No. 9789  
 Page 3

## 7. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale, Page 5

## 8. COMPLIANCE HISTORY/COMMENTS

- A. OEC – Compliance Order MM-CN-03-0084 was issued on March 28, 2004. Amended Compliance Order MM-CN-03-0084A was issued on June 14, 2005. Amended Compliance Order MM-CN-03-0084B was issued on February 24, 2006. The compliance order explained the following:
- a. DMR reviews and an inspection conducted by the Department June 22, 2005, revealed numerous violations from January, 2001 through March, 2005 for LPDES permit LA0091961
  - b. Noncompliance with Air Permit No. 2880-00059-V0
  - c. Using coatings and solvents that have nonpermitted toxic air pollutant constituents
- B. DMR Review/Excursions – DMRs were reviewed from March 31, 2007 to June, 2008. The following excursions were reported:

<u>Date</u>	<u>Parameter</u>	<u>Outfall</u>	<u>Reported Value</u>	<u>Permit Limits</u>
June, 2008	TSS	102	69 mg/L	45 mg/L
	Oil & Grease*	602	19 mg/L	15 mg/L
March, 2008	Fecal Coliform	004	570 col/100ml	400 col/100 ml
December, 2007	TSS	501	63 mg/L	45 mg/L
	Fecal Coliform	201	>6,000 col/100ml	400 col/100 ml
	TSS	202	52 mg/L	45 mg/L
	Fecal Coliform	703	710 col/100ml	400 col/100ml
	Fecal Coliform	401	600 col/100ml	400 col/100ml
June, 2007	Fecal Coliform	103	600 col/100ml	400 col/100ml
	TSS	102	53.5 mg/L	45 mg/L

\* The noncompliance report stated that the sample bottle may have been contaminated. The hydrostatic test water was not discharged until a second sample analysis was shown to be within permit limits.

## 9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 120509 of the Terrebonne Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 24, 2007 from Boggs (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance

Statement of Basis for  
Gulf Island Fabrication, Inc.  
East Yard, West Yard, and Southport  
LA0091961, AI No. 9789  
Page 4

of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

#### **10. HISTORIC SITES**

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

#### **11. TENTATIVE DETERMINATION**

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to modify the permit to address changes to the discharges described in the application.

#### **12. PUBLIC NOTICES**

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

Statement of Basis for  
 Gulf Island Fabrication, Inc.  
 East Yard, West Yard, and Southport  
 LA0091961, AI No. 9789  
 Page 5

### Rationale for Gulf Island Fabrication, Inc.

1. **Outfall 801** – treated sanitary wastewater from the GIF Corporate Headquarters building (estimated flow is 600 gpd)

Pollutant	Limitation		Reference
	Monthly Avg	Weekly Avg	
	mg/L		
Flow	Report	Report	
BOD <sub>5</sub>	20	30	Similar discharges* (BPJ), LAG560000
TSS	20	30	Similar discharges* (BPJ), LAG560000
Fecal Coliform colonies/100ml	200	400 (Daily Max)	Similar discharges* (BPJ), LAG560000

**Treatment:** extended aeration unit with chlorination

**Monitoring Frequency:** Quarterly for all parameters at the point of discharge from the STP prior to mixing with other waters. Monitoring frequency is based on current guidance for similar outfalls.

**Limits Justification:** Limits are based on current guidance for similar discharges from other industrial facilities and the Class III Sanitary General Permit, LAG560000 effective July 11, 2003. The estimated flow from this outfall is 600 gpd. However, the total sanitary flow from the facility is an estimated 41,600 gpd. Therefore, the limits are based on the Class III Sanitary General Permit, LAG560000 for discharges totaling less than 50,000 gallons per day maximum expected flow. Monitoring of pH will take place at final Outfall 001.

\* LDEQ current guidance for sanitary discharges from similar facilities